

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

TONYA CAMPBELL and JOHN PADEN,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

V.

INTERCONTINENTAL CAPITAL
GROUP, INC.,

Defendant.

Case No. 3:22-cv-34-DJN

**CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

COMES NOW Defendant Intercontinental Capital Group, Inc., by counsel, and hereby submits this Consent Motion for Extension of Time to Respond to Complaint (ECF No. 1). In support thereof, Defendant represents as follows:

1. Plaintiff's Complaint was filed on January 21, 2022, and Plaintiff granted Defendant an extension until February 28, 2022 to Respond to the Complaint.
2. Defendant filed an Unopposed Motion for Extension of Time on February 25, 2022 and the Court granted the Motion for Extension of Time on February 28, 2022 for Defendant to Respond to the Complaint by March 14, 2022.
3. The parties are still currently engaged in extensive settlement discussions with the intention of setting terms for a mediation and requesting a stay of this litigation while such occurs. Accordingly, Defendant now respectfully requests an additional two weeks to file a Response to the Complaint.

4. Plaintiff has consented to an Order granting this Motion, which is submitted contemporaneously with this Motion.

5. Defendant requests that the deadline for Defendant's Response to the Complaint be extended to March 28, 2022.

WHEREFORE, for the foregoing reasons, Defendant Intercontinental Capital Group, Inc. requests this Court grant its Motion for Extension of Time to Respond to Complaint and grant all such relief as it deems just and proper.

OFFIT KURMAN, P.A.

COFFIELD PLC

/s/ Anders T. Sleight

Anders T. Sleight, Esq. (VSB No. 84458)
8000 Towers Crescent Drive, Suite 1400
Vienna, VA 22182
Phone: (703) 745-1800
Fax: (703) 745-1835
anders.sleight@offitkurman.com

**Counsel for Defendant Intercontinental
Capital Group, Inc.**

Dated: March 11, 2022

/s/

Timothy L. Coffield (VSB No. 83430)
106F Melbourne Park Circle
Charlottesville, VA 22901
Phone: (434) 218-3133
Fax: (434) 321-1636
tc@coffieldlaw.com

**Counsel for Plaintiffs Tonya Campbell and
John Paden and all others similarly situated**

Dated: March 11, 2022

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all Counsel of record by the Court's ECF System.

OFFIT KURMAN, P.A.

/s/ Anders T. Sleight

Anders T. Sleight, Esq.

Dated: March 11, 2022